Appendix G
List of Acceptable Documentation Types

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Table G-1 lists the document types that were acceptable for justifying needs or costs for the CWNS 2004. It also provides the percentage of total needs that were documented with each document type.

Table G-1. CWNS 2004 List of Acceptable Documentation Types

Documentation Type	Allowable for Justification of: Need	Allowable for Justification of: Cost	Percent of Total Documented Needs in Table A-1
1. Capital Improvement Plan A capital improvement plan is a fiscal planning document used by cities that usually spans 1 to 20 years. It contains project- and cost-specific information and is sometimes referred to as a Master Plan. The capital improvement plan must adequately address why the project is needed and provide costs that are project-specific.	Yes	Yes	43.3
2. Infiltration/Inflow (I/I) Analysis An I/I analysis is a document that identifies excessive flow problems due to infiltration or inflow into the sewage conveyance system. The I/I analysis itself may be contained in a facility plan, a sewer system evaluation survey or a combined sewer overflow report.	Yes	Yes	< 0.1
3. Sewer System Evaluation Survey (SSES) An SSES is a document that contains the results of a sewer system survey, manhole inspection, smoke testing and flow monitoring. It is used to evaluate the physical condition of a sewer system and identifies areas of combined sewers, downspout connections and locations where the sewer system is at capacity. In many cases, a combined sewer overflow study is placed in this category.	Yes	Yes	0.9
4. Final Engineer's Estimate The final engineer's report is typically submitted as a result of a detailed facility design. It contains a specific description of the project scope and a list of work to be done with detailed itemized costs.	Yes	Yes	5.9
5. Cost of Previous Comparable Construction This estimate of cost must be based on the cost of a recently completed project that is similar in size, scope and location and for which detailed construction cost data are available. This document may be used to justify costs if stringent guidelines are followed and the costs are project-specific.	No	Yes	0.4
6. Facility Plan Excerpts from a facility plan are acceptable forms of documentation to justify a need and to update cost estimates. The facility plan contains project-specific information, and typically several alternatives are presented, including one recommended alternative. Only information covering the recommended alternative may be used to document a need and a cost estimate.	Yes	Yes	17.3
7. Plan of Study This documentation type must be an official project description. Any type of preliminary engineering study done before more detailed planning to assess the scope and feasibility of the project is categorized as a Plan of Study. It may be used only to document the need.	Yes	No[a]	< 0.1

Table G-1. CWNS 2004 List of Acceptable Documentation Types (continued)

Documentation Type	Allowable for Justification of Need	Allowable for Justification of Cost	Percent of Total Documented Needs in Table A-1
8. Intended Use Plan (IUP) The IUP, which is prepared annually, uses State-assigned criteria to rank projects for which Federal funding assistance is being sought during the current Federal fiscal year. The primary purpose of the IUP is to identify proposed annual intended uses of the amounts available to the CWSRF. A section 212 project listed in the IUP must be on the State Priority List to be eligible for CWSRF funding; a section 319 or 320 activity is not required to be on the State Priority List unless the activity is considered to be *nontraditional* NPS pursuant to the Funding Framework; however, such activities must be listed on a State's IUP for funding to occur.	Yes	Yes	4.8
9. State-Approved Area-wide or Regional Basin Plan The Clean Water Act's section 208 and 303 Regional Basin Plans are broad-based water quality management plans written to identify future planning for areas in a State. Only section 208 and 303 documents that contain site-specific information and a description of a need may be accepted as documentation of need. Documentation of cost is assessed case by case depending on the amount of detail reported and the source of the information.	Yes	Yes[b]	1.5
10. Grant Applications and CWSRF Loan Applications Federal or equivalent State grant applications or CWSRF applications may be used to document needs and to update costs for the categories in which the grant or loan money is requested. Applications should contain sufficient clearly written narrative that defines the specific project and the water quality or public health problem. If an equivalent State grant program application is used as documentation, the form must be submitted.	Yes	Yes	2.3
11. State Project Priority List The State Priority List ranks projects by State-assigned criteria for which Federal funding assistance is being sought. States may select projects from the State Priority List for inclusion in the Intended Use Plan (IUP) regardless of the rank of the project on the State Priority List. States are not required to develop a new CWSRF priority list each year; they may develop a single multiyear CWSRF priority list, which could be considered their current list and the list need not be updated annually. Because the *fundable* portion of the State Priority List is usually included in a State's IUP and there is ambiguity in defining the *fundable* and *planning* portion of the State Priority List, as well as the State-to-State variability in the lists, only the State's current State Priority List may be used to justify need (and not cost).	Yes	No	< 0.1
12. Diagnostic Evaluation A diagnostic evaluation is usually performed when a facility cannot achieve effluent discharge permit limits or when it experiences design, operational, analytical or financial problems that limit the performance of the facility. This type of evaluation may be used to document a need if the results indicate that construction is necessary to achieve compliance.	Yes	No	< 0.1
13. Administration Order/Court Order/Consent Decree These official documents are usually issued as the result of continued violation of a National Pollutant Discharge Elimination System permit or other pollution control requirements. The order or decree must state a need for construction to correct the violation to document the need. Cost curves may be used to calculate associated costs.	Yes	No	< 0.1

Table G-1. CWNS 2004 List of Acceptable Documentation Types (continued)

Documentation Type	Allowable for Justification of: Need	Allowable for Justification of: Cost	Percent of Total Documented Needs in Table A-1
14. Sanitary Survey A Sanitary Survey is a logical, investigative approach to gather information to evaluate the condition of existing onsite wastewater systems. The sanitary survey must document high area-wide failure rates that are considered serious enough to be a health hazard (such as ground water contamination caused by malfunctioning septic tanks) to document a need. The documentation must clearly state that onsite failures are contributing to a water pollution or health-related problem. EPA reviews this documentation case by case.	Yes	No	0.1
15. State-Approved Local/County Comprehensive Water and Sewer Plans These plans are similar to State-Approved Area-Wide Basin Plans. These local plans also cover fairly large areas and might not contain project-specific information. These local plans must clearly identify a water quality or health-related problem and must be project-specific to be acceptable as documentation.	Yes	Yes[b]	1.3
16. State Certification of Excessive Flow This document may be used to demonstrate that a need exists for infiltration/inflow correction.	Yes	No	-
17. State-Approved Municipal Wasteload Allocation Plan A Municipal Wasteload Allocation Plan is a water quality analysis used to determine the level of treatment required by a specific project, which is ultimately translated into an effluent limitation or BMP for the National Pollutant Discharge Elimination System permit. These plans may be used to justify the need for a treatment plant enlargement or upgrade as long as the study identifies a specific sewage treatment point source and appropriate design flows and treatment levels. This plan may be used to document a need and may be used to update costs if the project descriptions identify specific costs.	Yes	Yes[b]	< 0.1
18. Total Maximum Daily Load (TMDL) A TMDL is an estimation of the maximum amount of a pollutant that a waterbody (one listed on a State's 303(d) list) can receive and still meet water quality standards, and it includes an allocation of the allowable pollutant discharge amount to different point and nonpoint sources. Project-specific needs should be identified. If used to justify costs, TMDL Reports or TMDL Implementation Plans containing cost data will be reviewed case by case.	Yes	No[c]	< 0.1
21. National Pollutant Discharge Elimination System (NPDES) or State Permit Requirements (with Schedule) NPDES is a permitting program implemented under authority of the Clean Water Act and designed to control point source discharges of pollution. Facilities not meeting effluent limitations and compliance schedules or facilities *required* to plan because they are at or near plant capacity may submit documentation under documentation type 21.	Yes	No	< 0.1
22. Municipal Stormwater Management Plan A Municipal Stormwater Management Plan is a plan that describes a proposed municipal stormwater management program as part of a municipality's NPDES stormwater permit application. It includes a description of structural and source control measures that are to be implemented to (1) reduce pollutants in runoff from commercial and residential areas that is discharged from the storm sewer, (2) detect and remove illicit discharges and improper disposal into storm sewers, (3) monitor pollutants in runoff from industrial facilities that discharge to municipal separate storm sewers, (4) reduce pollutants in construction site runoff that is discharged to municipal separate storm sewers, and (5) enhance municipal maintenance, public education and public involvement.	Yes	No[c]	0.2

Table G-1. CWNS 2004 List of Acceptable Documentation Types (continued)

Documentation Type	Allowable for Justification of: Need	Allowable for Justification of: Cost	Percent of Total Documented Needs in Table A-1
23. Nonpoint Source Management Plan/Assessment Report A Nonpoint Source Management Plan is a 4-year plan developed by a State to address nonpoint source pollution problems. Elements of the plan include identification of the best management practices and measures to reduce pollutant loading; programs to achieve implementation; a schedule with annual milestones, costs, and identification of specific projects; certification that the laws of the State will provide adequate authority to implement the plan; and sources of funding and assistance. A Nonpoint Source Assessment Report assesses the extent of pollution due to diffuse or nonpoint sources within a State. The report identifies navigable waters that require nonpoint source controls to achieve Clean Water Act water quality standards, sources and amounts of such pollution, and State and local control programs. It also describes the process that will be used to identify best management practices. EPA will consider other documentation, such as nonpoint source grant applications and States' surveys, case by case.	Yes	No[c]	-
24. Nonpoint Source Management Plan/Ground Water Protection Strategy States may use a Comprehensive Ground Water Protection Strategy to document nonpoint source needs if the strategy is part of a Nonpoint Source Management Program. The goals of this major Federal initiative addressing ground water protection are to strengthen State ground water programs; deal with significant, poorly addressed ground water problems; create a policy framework within EPA for the guidance of ground water policy; and strengthen the ground water organization within EPA. Included in such a strategy are programs established under the Safe Drinking Water Act such as regulation of the injection of wastes into deep wells, the Wellhead Protection Program, and the Sole Source Aquifer Program. Provisions in the Resource Conservation and Recovery Act for leaking underground storage tanks, goals in the Comprehensive Environmental Response, Compensation, and Liability Act for contaminated ground water sites, and State grant programs in the Clean Water Act for ground water protection activities are covered by this strategy.	Yes	No[c]	-
25. Nonpoint Source Management Plan/Wellhead Protection Program and Plan A Wellhead Protection Plan may be used to document nonpoint source needs if it is part of a Nonpoint Source Management Program. As part of its overall ground water protection strategy, each State must delineate wellhead protection areas for wells or well fields used for public water supply. Contaminant sources within the wellhead protection area must be identified and a management plan developed to protect the water supply in that area from contamination. Contingency plans for each public water supply system must be developed to ensure an appropriate response in the event that contamination occurs, and standards must be established for locating new wells so as to minimize the potential for contamination of the water supply.	Yes	No[c]	-
26. Nonpoint Source Management Plan/Delegated Underground Injection Control Program Plan A State may document needs to address nonpoint source aspects of a Delegated Underground Injection Control Program Plan if it is part of the State's Nonpoint Source Management Program. As part of the Safe Drinking Water Act, EPA and State Underground Injection Control Programs were established to protect potential underground sources of drinking water from contamination by injection wells.	Yes	No[c]	-

Table G-1. CWNS 2004 List of Acceptable Documentation Types (continued)

Documentation Type	Allowable for Justification of		Percent of Total Documented Needs in Table A-1
	Need	Cost	
27. Estuary Comprehensive Conservation Management Plan (CCMP) A CCMP is a management plan developed for an estuary that has been nominated for the Clean Water Act section 320 National Estuary Program. The CCMP summarizes findings, identifies and establishes a priority for addressing problems, determines environmental quality goals and objectives, identifies action plans and compliance schedules for pollution control and resource management, and ensures that designated uses of the estuary are protected.	Yes	No[c]	-
28. Funding Applications (*applicable only for communities with populations of fewer than 3,500*) All applications for funding (with signed agency review sheets, e.g., Rural Economic and Community Development—formerly Farmers Home Administration, Community Development Block Grant—Housing and Urban Development) other than State Revolving Funds are acceptable for need. The application is acceptable for cost if an engineering report is reviewed by qualified State project staff.	Yes	Yes	0.1
29. State Needs Surveys (*applicable only for communities with populations of fewer than 3,500*) All State Needs Surveys are acceptable for documenting *need* if: • A local government official's signature is included (*local* means city, community, town, borough, village or county) • Information describing the problem is attached • Information describing prior or ongoing planning efforts and descriptions of the cost-effective control option are offered State Needs Surveys are acceptable for documenting *cost* if a cost estimate that has been prepared and signed by an engineer or engineer circuit rider is attached. The cost estimate need not be as detailed as that found in a facility plan, but it must include the engineer's rationale for the estimate. Qualified State project staff must also sign a Statement of Cost Reasonableness after reviewing the estimate.	Yes	Yes	0.3
30. Model Survey (*applicable only for communities with populations of fewer than 3,500*) Use of a standard or *model* survey form is acceptable for documenting need (and cost) as long as appropriate signatures are included. If costs are not included, cost curves may be used.	Yes	Yes	0.3
31. Information from an Assistance Provider (*applicable only for communities with populations of fewer than 3,500*) A statement of need from a technical assistance provider (e.g., State training center, health department, circuit rider) along with a soils/geologic report may document need for communities. Local official and provider signatures must be included. Cost curves may be used to document costs.	Yes	No	< 0.1
32. Vulnerability Assessments for Homeland Security Needs This document may be used to assess needs and might have information that can be used to justify costs. Cost justification for Categories I–VII must be project-specific and distributable among categories. The document should be submitted to the contractor to determine whether the costs are eligible.	Yes	No[c]	-

Table G-1. CWNS 2004 List of Acceptable Documentation Types (continued)

Documentation Type	Allowable for Justification of		Percent of Total Documented Needs in Table A-1
	Need	Cost	
35. New State or Federal Regulation This documentation is for new State or Federal regulations, not future or proposed ones. New regulation documentation documents a need but not cost. It is expected that states use cost documentation such as Cost of Previous Comparable Construction or, when appropriate, CWNS 2004 cost curves to develop costs. Note that State-generated general cost factors applied to all affected facilities are not acceptable for documenting costs.	Yes	No	-
36. Combined Sewer Overflow Long-Term Control Plan (LTCP) A plan, comparable to a facility plan, that describes long-term control measures for combined sewer overflows. Quality may vary across States. Documentation must be submitted.	Yes	Yes	3.6
40. Approved State Annual 319 Workplans These are Nonpoint Source Management Program workplans approved for section 319(h) funding.	Yes	No[c]	-
41. Approved State 319 Project Implementation Plans These are Nonpoint Source Management Program project implementation plans approved for section 319(h) funding.	Yes	Yes	-
98. Combined Sewer Overflow Cost Curves Though not actually a document, these cost curves are an approximation of costs to control combined sewer overflows. Because combined sewer overflows are public health threats, the needs to control them are automatically justified.	NA	Yes	14.5
99. EPA-HQ Approved These are documents preapproved by EPA headquarters. Some examples are Nutrient Reduction Technology Cost Estimations for Point Sources in the Chesapeake Bay Watershed, 2001-2003 Community Preservation Plan for the Town of Southampton and Blackstone River Fisheries Restoration Plan	Yes	Yes	2.8

NA = not applicable.

[a] Cost curves or other allowable documents for cost justification may be used to justify costs.

[b] EPA will review documentation to make sure that costs are within acceptance ranges.

[c] Documentation might have information that may be used to justify cost. Cost must be project-specific and distributable among Categories.